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June 30, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-B204  
Washington, DC 20554

**Re: *Ex Parte* Communication  
WT Docket No. 02-353 – Service Rules for Advanced Wireless Services  
("AWS") in the 1.7 GHz and 2.1 GHz Bands**

Dear Madam Secretary:

Rural Cellular Association ("RCA"), through counsel, submits this *ex parte* letter in response to proposals that the Commission revise its band plan for AWS spectrum in the 1710 to 1755 MHz and 2110 to 2155 MHz bands.

The record reflects that RCA filed a Petition for Reconsideration in this proceeding to request that the Commission revise its band plan to make more of the AWS spectrum available according to RSA/MSA geographic boundaries. Over time, an assortment of new band plan proposals has been submitted to the Commission. RCA has reviewed each of the proposals and is of the view that there is considerable merit to the T-Mobile/RTG proposal in that it would provide for six rather than five licenses per area, and that it retains the concept of a 20 MHz license for RSA/MSA markets as requested by RCA. Comparing the Verizon Wireless plan to the T-Mobile/RTG plan, RCA is of the view that the T-Mobile/RTG plan is preferable because the license block at the upper end of the band would be for REAG-sized markets. In the comparatively large REAG license areas there would be more flexibility for AWS licensees to accommodate the transition of MDS Channel 1 incumbents while REAG licensees concentrate on build-out in areas where the MDS licensees are not an impediment to use of the AWS spectrum.

Sincerely,

***Filed Electronically***

David L. Nace  
Counsel for Rural Cellular Association

cc: Best Copy and Printing, Inc. (by email)